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*Attorneys for Plaintiff,
Dry Bulk Singapore Pte. Ltd.*

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

PORTLAND DIVISION

DRY BULK SINGAPORE PTE. LTD.)

Plaintiff,)

v.)

Case No. 3:19-cv-01671-BR

Amis Integrity S.A. *in personam*, and)
M/V AMIS INTEGRITY (IMO 9732412))

IN ADMIRALTY

her engines, freights, apparel,)
appurtenances, tackle, etc., *in rem*,)

Defendants.)

PARTIES' JOINT REQUEST TO AMEND COURT'S SCHEDULING ORDER

For the reasons more fully set forth herein, the Parties respectfully submit this Joint Request to Amend the Court's Scheduling Order (Dkt.50).

1. This maritime related case involves parties and witnesses who are located in Singapore, Taiwan, and the United Arab Emirates (UAE).

2. The parties have identified at least three critical witnesses in this matter who are currently located in Taiwan; at least one witness in Singapore and at least one witness in the UAE.

3. The parties were in the process of scheduling these depositions to take place in March, 2020 to comply with the Court's Fact Discovery deadline of April 30, 2020 (Dkt. 50) when the Coronavirus epidemic arose and travel restrictions/quarantines were implemented.

4. Counsel waited for several weeks in the hopes that the situation would improve, but, in fact, it appears to have worsened as far as travel restrictions are concerned.

5. Taiwan and Singapore have imposed travel restrictions to and from those countries, as well as restrictions to travel from and to other countries in the region in which airline connections may need to be made in order to reach the final destination (i.e. Hong Kong, China, Japan and South Korea).

6. Such restrictions include mandatory fourteen-day (14) quarantines for individuals travelling to or from Taiwan and/or Singapore or to or from airline connecting restricted countries. Such quarantine restrictions could apply to counsel travelling to Taiwan and Singapore and/or to witnesses travelling from such countries to the United States to testify, if the depositions were held in the US instead of Taiwan and/or Singapore.

7. Under the circumstances, counsel in this matter respectfully request the court to amend and modify the current scheduling Order to extend the fact discovery for another sixty (60) days and for all the remaining dates in the Order to be similarly extended.

DATED: March, 10, 2020

Respectfully Submitted,

SCHWABE, WILLIAMSON & WYATT, P.C.

By: /s/ David R. Boyajian

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restricted appearance

SO ORDERED _____

U.S.D.C.

March __, 2020